

SCHNEIDER LAW OFFICES, PLLC
243 MAIN STREET – SUITE 250
NEW PALTZ, NY 12561
P – (845) 419-2354
F – (888) 299-9918

WWW.BRYANSCHNEIDERESQ.COM

BRYAN@BRYANSCHNEIDERESQ.COM

October 27, 2021

Hon. Nelson S. Román, USDJ
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 10/29/2021

RE: G & G Closed Circuit Events, LLC v. Irma Giron et al.
Case No.: 7:21-cv-06922-NSR

Dear Judge Román:

I represent the defendants in the above referenced action and am submitting this letter with plaintiff's consent. Defendants respectfully request the Court grant Defendants a 60-day extension of time to respond to Plaintiff's October 12, 2021 discovery demands including its request for admissions. Settlement negotiations are in progress and the parties would like to minimize their litigation expenses, if possible. The parties also welcome the Court's intervention with respect to settlement prospects should you believe it appropriate.

Thank you in advance for your consideration of this request. Please feel free to contact me with any questions or concerns.

Respectfully,

~~Bryan G. Schneider~~

cc: M.L. Zager, P.C.
Attn: Robert Hunter, Esq.

Defendants' request for an extension is GRANTED. The Court waives the Initial Pre-trial Conference and directs the Parties to complete a Case Management Plan and Scheduling Order (blank form attached hereto). Said Scheduling Order shall be submitted to chambers by November 12, 2021. The Clerk of Court is kindly requested to terminate the motion (ECF No. 12).

DATED: Oct. 29, 2021
White Plains, NY

SO ORDERED:

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
Rev. Jan. 2012

Plaintiff(s),
- against -

**CIVIL CASE DISCOVERY PLAN
AND SCHEDULING ORDER**

Defendant(s).

_____ CV _____ (NSR)

-----x
This Civil Case Discovery Plan and Scheduling Order is adopted, after consultation with counsel, pursuant to Fed. R. Civ. P. 16 and 26(f):

1. All parties [consent] [do not consent] to conducting all further proceedings before a Magistrate Judge, including motions and trial, pursuant to 28 U.S.C. § 636(c). The parties are free to withhold consent without adverse substantive consequences. (If all parties consent, the remaining paragraphs of this form need not be completed.)
2. This case [is] [is not] to be tried to a jury.
3. Joinder of additional parties must be accomplished by _____.
4. Amended pleadings may be filed until _____.
5. Interrogatories shall be served no later than _____, and responses thereto shall be served within thirty (30) days thereafter. The provisions of Local Civil Rule 33.3 [shall] [shall not] apply to this case.
6. First request for production of documents, if any, shall be served no later than _____.
7. Non-expert depositions shall be completed by _____.
 - a. Unless counsel agree otherwise or the Court so orders, depositions shall not be held until all parties have responded to any first requests for production of documents.
 - b. Depositions shall proceed concurrently.
 - c. Whenever possible, unless counsel agree otherwise or the Court so orders,

non-party depositions shall follow party depositions.

8. Any further interrogatories, including expert interrogatories, shall be served no later than _____.
9. Requests to Admit, if any, shall be served no later than _____.
10. Expert reports shall be served no later than _____.
11. Rebuttal expert reports shall be served no later than _____.
12. Expert depositions shall be completed by _____.
13. Additional provisions agreed upon by counsel are attached hereto and made a part hereof.
14. **ALL DISCOVERY SHALL BE COMPLETED BY** _____.
15. Any motions shall be filed in accordance with the Court's Individual Practices.
16. This Civil Case Discovery Plan and Scheduling Order may not be changed without leave of Court (or the assigned Magistrate Judge acting under a specific order of reference).
17. The Magistrate Judge assigned to this case is the Hon. _____.
18. If, after entry of this Order, the parties consent to trial before a Magistrate Judge, the Magistrate Judge will schedule a date certain for trial and will, if necessary, amend this Order consistent therewith.
19. The next case management conference is scheduled for _____, at _____. (The Court will set this date at the initial conference.)

SO ORDERED.

Dated: White Plains, New York

Nelson S. Román, U.S. District Judge